

May 23, 2022

Mr. Ricky Vargas
Land and Redevelopment Program Branch
Land, Chemicals and Redevelopment Division
United States Environmental Protection Agency, Region 2
290 Broadway, 25th Floor
New York, New York 10007

Subject: *Response to USEPA Comment on the CAMU Closure Construction Completion Report (CCR)*
Former Chevron Perth Amboy Facility, Perth Amboy, New Jersey
SRP PI #003621

Dear Mr. Vargas,

On behalf of Chevron Environmental Management Company (Chevron), Parsons has prepared a response to comments received from the United States Environmental Protection Agency (USEPA) in a letter dated March 18, 2022. These comments were related to Chevron's CAMU Closure Construction Completion Report (CCR), dated September 8, 2021. Chevron's response to the USEPA's comments are included below.

USEPA Comment: *While EPA acknowledges that the construction of the liner and cap will serve as protective measures, can Chevron please confirm what measures it is taking to ensure that any potential future releases are minimized to the extent practicable.*

Chevron Response:

Chevron performs the groundwater and leachate monitoring as per Leak Detection Monitoring Program (LDMP) and a Leachate and Groundwater Monitoring Plan (LGMP) for Cells 1 through 3 dated June 9, 2017 (Chevron 2017), and Annual Updates of Upper Prediction Limits (UPLs) dated October 18, 2018 (Chevron 2018), October 31, 2019 (Chevron 2019) and May 6, 2021 (Chevron 2021). Groundwater monitoring and leachate monitoring are performed on a quarterly basis. The last UPL update (2020 update) was submitted to NJDEP and USEPA on May 6, 2021. The CAMU LDMP and LGMP (Rev 4) were approved by NJDEP in a letter dated June 4, 2021 (NJDEP 2021). Chevron compares the groundwater quality results to the latest UPLs (2020 update) to ensure the selected constituents do not indicate leakage from the CAMU.

Chevron performs a monthly visual inspection of the cap, to inspect for disturbances of the stone cover due to erosion and human or animal activity, as well as the integrity of the liner in locations where it is visible. Additionally, daily inspections are performed at the leachate conveyance system to ensure proper operation and to inspect for any potential releases. These daily inspections include ensuring proper leachate pump operation and checking aboveground conveyance piping for leaks. In addition to this, daily inspections also include monitoring leak detection units for below ground double walled piping that communicate wirelessly with the on-site Program Logic Controller (PLC) unit. Regular preventive maintenance is also performed on the system, as applicable, to ensure continued, proper operation by addressing system fatigue and damage before they have

a negative impact. These maintenance tasks range in frequency from weekly to annually, depending on the task.

USEPA Comment: *Please confirm that no waste remains in the Primary and Secondary Staging and Treatment areas.*

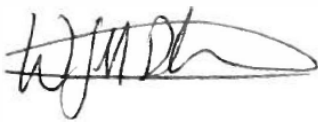
Chevron Response: Chevron confirms that no waste remains in the Primary and Secondary Staging and Treatment areas.

References:

- Chevron. 2017. Updated Leak Detection Monitoring Program (LDMP) and Updated Leachate and Groundwater Monitoring Plan (LGMP) for CAMU Cells 1 through 3. June 9.
- Chevron. 2018. 2018 Annual Update of UPLs for CAMU Cells 1 through 3. October 18.
- Chevron. 2019. 2019 Annual Update of UPLs for CAMU Cells 1 through 3. October 31.
- Chevron. 2021. 2020 Annual Update of UPLs for CAMU Cells 1 through 3. May 6.
- NJDEP. 2021. Approval on 2020 Annual Update of UPLs for CAMU Cells 1 through 3 dated May 6, 2021. June 04.

Should you require any additional information, please contact me directly at (570) 977-6464.

Sincerely,



Jeff Detrick, CHMM
Project Manager
Parsons

Enclosure (as stated)

cc: Brian Connors, CEMC
Charlie Zielinski, NJDEP
Michael Samuel, Buckeye Perth Amboy Terminal, LLC
Krista Manley, Buckeye Perth Amboy Terminal, LLC

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